

30 December 2012

Ms. Cora Stanley Region 6, USEPA 6MD-RT 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202

RE: Potential Conflict of Interest Notification

Clean Harbors

Emergency Response TDD: Pending

EPA Contract: EP-W-06-042

Submitted via email on 30 December 2012

Dear Ms. Stanley:

This letter documents a potential conflict of interest associated with an emergency response that START mobilized to on 18 December 2012. The NRC number associated with this incident is 1033656. The START mobilization was in response to a chemical reaction/fire involving 7,200 gallons of dichloroisocyanurate at the Clean Harbors TSD facility located at 2600 Short Hillsborough, El Dorado, Union County, Arkansas. The generator of the material involved in the incident has been identified as BioLab, Inc. Weston has no previous relationship with BioLab, Inc.

## POTENTIAL CONFLICT OF INTEREST NOTICE

Clean Harbors

## 1. Name and location of site/facility:

On 18 December, START mobilized to the site of chemical reaction/fire involving 7,200 gallons of dichloroisocyanurate at the Clean Harbors TSD facility located at 2600 Short Hillsborough, El Dorado, Union County, Arkansas.

PRP: Clean Harbors

Location: 2600 Short Hillsborough, El Dorado, Union County, Arkansas

Description: Emergency Response

EPA OSC: Nick Brescia START FTL: Heth Parnell

**2. TDD NO:** Pending

- 3. Has Weston or any employee that will be working at this site previously performed work at this site/facility?
- 4. If yes, has Weston or any employee that will be working at this site previously preformed work at this site/facility during the past 3 calendar years? N/A If yes, then:
  - A. Type of work Weston has performed for the client: N/A
  - B. Names of employees who worked at site: N/A
  - C. Dates work took place: N/A
  - D. Clients for whom work was performed: N/A
- 5. Are the clients involved at this site current (within past 3 years) Weston clients: Yes
- **6.** Is this a site assessment or a removal site:
- 7. Names of known, potentially responsible parties (PRPs): Clean Harbors, BioLab, Inc.
- 8. If a PRP/client is a current Weston client:
  - A. Does the contract dollar or revenue dollar value of work performed for the client within the past 3 years exceed \$250,000?

    No
  - B. Total contract dollars within last 3 years: \$35,000

## FEDERAL SITES/FACILITIES: (DOD, DOI, etc.)

- 9. What federal agency is/was involved at site? N/A
- 10. Has Weston performed work for this federal agency involving the same site and/or same people? Is there impending work for this federal agency involving the same site and/or same people? N/A

## **REGARDING ALL SITES:**

- 11. If the site is high visibility including public, media, and/or political interest -- please report any work that Weston has performed for the client (federal or private) currently or in the past. (See above..): N/A
- 12. Provide any additional information which may be pertinent to this situation. (Including, but not limited to, whether work is completed, or whether the work/contract is finally settled and paid; if the work was performed more than 3 years ago; and when work was performed; etc.) Weston has performed one project for Clean Harbors within the last three years totaling \$35,000. In total, Weston has performed 13 projects for Clean Harbors, beginning in 1995. The total dollar value of these projects is slightly over \$700,000.

START has demobilized from the site, and at this time there are no plans to return. We plan to proceed with tasked direction until we hear differently from you. I will be happy to discuss this potential conflict issue with you at your convenience. If additional information is needed, please let me know.

Very truly yours,

WESTON SOLUTIONS, INC.

Robert B. Beck

Robert B. Beck, P.E. Program Manager

cc: Ms. Linda Carter (EPA START PO)

Mr. David Crow (Weston) Ms. Cecilia Shappee (Weston)